

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

GEL DIRECT TRUST,
GEL DIRECT, LLC,
JEFFREY K. GALVANI,
STUART A. JEFFERY,

Defendants.

Civ. Action No. 1:22-cv-09803

DECLARATION OF KEEFE BERNSTEIN

I, Keefe Bernstein, declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the following is true and correct and that I have personal knowledge of, and am competent to testify to, the matters stated herein.

1. I am an attorney admitted before this Court *pro hac vice* and counsel for Plaintiff in this matter. I submit this declaration in support of Plaintiff's Motion to Exclude Defendants' Expert Jeffrey S. Holik.

2. Attached hereto are true and correct (PII redacted) copies of the following:

Ex. A: April 7, 2023 Expert Report of Jeffrey S. Holik received from Defense counsel

Ex. B: June 2, 2023 Supplement Expert Report of Jeffrey S. Holik received from
Defense counsel

Ex. C: Excerpts from the June 7, 2023 Deposition of Jeffrey S. Holik

Ex. D: Jeffrey S. Holik's CV received from defense counsel

Executed on June 16, 2023.



Keefe Bernstein